

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
NO. 1:15-cv-00399-TDS-JEP**

SANDRA LITTLE COVINGTON, *et al.*,

PLAINTIFFS,

v.

THE STATE OF NORTH CAROLINA, *et al.*,

DEFENDANTS.

**PLAINTIFFS' MOTION FOR  
ATTORNEYS' FEES AND COSTS**

NOW COME Plaintiffs, by and through their undersigned counsel, and pursuant to 42 U.S.C. § 1988, 52 U.S.C. § 10310(e), Fed. R. Civ. P. 54, and LR 54.2, move this Court for an award of fees and expenses following Plaintiffs' success on the merits of this case. Plaintiffs request that the Court approve the following fees and expenses:

- \$598,572.00 in attorneys' fees to the Southern Coalition for Social Justice;
- \$75,629.15 in expenses to the Southern Coalition for Social Justice;
- \$753,539.00 in attorneys' fees to Poyner Spruill;
- \$59,705.35 in expenses to Poyner Spruill;
- \$35,650.00 in attorneys' fees to Adam Stein.

Total: \$1,523,095.50

In support of this Motion, Plaintiffs rely on their Memorandum in Support of their Motion for Attorneys' Fees and Costs; the Declarations of Edwin M. Speas, Allison J. Riggs, Adam Stein, Michael Crowell, and Ezra Rosenberg; the Statement of Consultation as required by LR 54.2; and the Court's Memorandum Opinion (ECF 123), Final

Judgment (ECF 125), and Supreme Court Final Judgment (ECF 158). These materials demonstrate that Plaintiffs are the prevailing parties in this matter and that their requested fees and expenses are reasonable.

Plaintiffs respectfully reserve the right to seek additional fees and expenses for all work relating to remedial matters in this case, which at this time are not yet completed.

WHEREFORE, Plaintiffs request that the Court award Plaintiffs \$1,523,095.50 (\$674,201.15 to SCSJ; \$813,244.35 to Poyner Spruill; \$35,650 to Adam Stein); allow Plaintiffs leave to file a supplemental fee petition within 30 days after a final order on remedy; and grant such other and further relief as the Court deems just and appropriate.

Respectfully submitted, this the 22nd day of March, 2018.

POYNER SPRUILL LLP

SOUTHERN COALITION FOR SOCIAL  
JUSTICE

/s/ Edwin M. Speas, Jr.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this date I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will provide electronic notification of the same to all counsel and parties of record.

This the 22nd day of March, 2018.

/s/ Edwin M. Speas, Jr.

Edwin M. Speas, Jr.